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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

JEREMIAH COOK, an individual,

Plaintiff,

v.

TEQUILA THURMAN in her individual capacity,
CARRIE HUTCHISON in her individual
capacity, and **RYAN LUFKIN** in his individual
capacity;

Defendants.

Case No. 3:24-cv-01481-AB

**JOINT RULE 26(F) REPORT & MOTION FOR
EXTENTION OF PRETRIAL DEADLINES**

On October 31, 2024 the parties conducted a Fed. R. Civ. P. Rule 26(f) and Local Rule 26-1 conference. The following counsel agreed to this joint report and proposed discovery plan:

J. Ashlee Albies on behalf of Plaintiff and Michelle Enfield & Michael Washington from the Oregon Department of Justice on behalf of Defendant Lufkin, Andrea Coit from Hutchinson Cox on behalf of Defendant Hutchison, and Michael Porter from the City of Portland on behalf of Defendant Thurman. The parties report as follows:

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1. Initial Disclosures: The parties have agreed to December 6, 2024 deadline for initial disclosures.
2. Subjects of Discovery: The parties anticipate discovery will be had on the claims and issues raised by Plaintiff in his Complaint, and the claims and issues raised by Defendants' Answers and Affirmative Defenses.
3. Claims of Privilege or Protection: The parties will confer on any discovery disputes concerning any applicable privilege and/or protection as to trial preparation materials prior to seeking judicial assistance. If the parties cannot come to an agreement on any areas of dispute, the parties will follow the applicable provisions in the Federal Rules of Civil Procedure and Local Rules concerning discovery disputes.
4. The parties agree that discovery exchanged in this case will require a Protective Order, and the parties anticipate needing the Court's assistance regarding proposed language which deviates from the Oregon District Court's Tier 2 or Tier 1 Protective Orders.
5. The parties agreed to defer ESI discussions until after the initial disclosures, and agree to provide native format to the best of their ability. The parties anticipate that Defendants' ESI discovery may require an agreement by the parties on search terms, which may require the Court's attention if the parties cannot come to agreement. The parties do not foresee any other significant ESI issues.
6. The parties agree to give 7 days' notice of intent to serve any subpoenas under Fed. R. Civ. P. 45, to allow for any objections, conferrals, and modifications before service.

The parties discussed the current pre-trial deadlines and agree additional time is necessary. The parties request that the current deadlines be extended as follows:

File all pleadings pursuant to Fed. R. Civ. P 7(a) and 15	April 1, 2025
Join all claims, remedies, and parties pursuant to Fed. R. Civ. P. 18 & 19	April 1, 2025
Complete all fact discovery	May 1, 2025
File all dispositive motions	June 1, 2025
Experts Disclosure/Reports	30 days after the Court's ruling on dispositive motions
Expert Rebuttal Reports	14 days after Expert Reports
Close of Expert Discovery	30 days after Expert Disclosure/Reports.
Joint ADR report/Pretrial Report Deadline	30 days after the Court's ruling on dispositive motions

This motion is not made for purposes of delay.

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Respectfully submitted this 8th day of November 2024.

s/ J. Ashlee Albies

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